

Marc J. Randazza, NV Bar No. 12265

Trey A. Rothell, NV Bar No. 15993

RANDAZZA LEGAL GROUP, PLLC

4974 S. Rainbow Blvd., Suite 100

Las Vegas, Nevada 89118

Telephone: 702-420-2001

ecf@randazza.com

Maxwell Goss (will comply with LR IA 11-2 within 14 days)

Elizabeth Erickson (will comply with LR IA 11-2 within 14 days)

MAXWELL GOSS PLLC

32400 Telegraph Rd., Suite 103

Bingham Farms, Michigan 48025

Telephone: (248) 266-5879

max@maxwellgoss.com

elizabeth@maxwellgoss.com

Attorneys for Defendants

Chang's Dynasty LLC and Alan Chang

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE SPEARMINT RHINO COMPANIES
WORLDWIDE, INC., and K-KEL, INC.,

Plaintiffs,

v.

CHANG'S DYNASTY LLC, and
ALAN CHANG,

Defendants.

Case No. 2:23-cv-02040-ART-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

[First Request]

**STIPULATION AND [PROPOSED] ORDER TO
EXTEND TIME TO RESPOND TO COMPLAINT**

Plaintiffs The Spearmint Rhino Companies Worldwide, Inc., and K-Kel, Inc., (“Plaintiffs”) and Defendants Chang’s Dynasty LLC and Alan Chang (“Defendants”) stipulate to extend the time by which Defendants may respond to the Complaint in this action by 21 days from January 10, 2024 to January 31, 2024, and to otherwise set the date by which Defendant Alan Chang may respond to the Complaint as January 31, 2024, and in support thereof, say:

1. Plaintiffs filed their Complaint in this action on December 8, 2023. ECF No. 1.

2. Defendant Chang’s Dynasty LLC was served with the Complaint in this action on or about December 20, 2023. ECF No. 6.

3. To-date, Defendant Alan Chang has not yet been served with the Complaint.

4. On January 3, 2024, counsel for Defendants requested an extension of time to respond to the Complaint from counsel for Plaintiffs.

5. There is good cause to extend the time by which Defendants may respond to the Complaint in this action because counsel for Defendants were only recently retained by Defendants in relation to this action and require additional time to investigate the facts and circumstances pleaded in the Complaint prior to filing Defendants’ responses.

6. Based upon Defendants’ request, the Parties have agreed to extend the deadline by which Defendants may respond to the Complaint by 21 days from January 10, 2024 to January 31, 2024, subject to this Court’s approval.

7. Defendants have not previously requested an extension of the deadline to respond to the Complaint.

8. Additionally, as Defendant Chang has not yet been personally served, Defendant Chang stipulates to accept service of the Summons and Complaint in this action.

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9. The Parties jointly stipulate that Defendant Chang shall have until January 31, 2024 to respond to the Complaint in this action.

IT IS SO STIPULATED.

DATED this 9th day of January 2024.

/s/ Trey A. Rothell

Marc J. Randazza, NV Bar No. 12265

Trey A. Rothell, NV Bar No. 15993

RANDAZZA LEGAL GROUP, PLLC

4974 S. Rainbow Blvd., Suite 100

Las Vegas, NV 89118

Attorneys for Defendants

Chang's Dynasty LLC and Alan Chang

DATED this 9th day of January 2024.

/s/ Douglas Q. Hahn

Douglas Q. Hahn (*pro hac vice*)

STRADLING YOCCA CARLSON & RAUTH, P.C.

660 Newport Center Drive

Newport Beach, CA 92660

Tel: (949) 725-4000

dhahn@stradlinglaw.com

Meng Zhong, Esq. (NV Bar No. 12145)

Ogonna M. Brown, Esq. (NV Bar No. 7589)

LEWIS ROCA ROTHGERBER CHRISTIE LLP

3993 Howard Hughes Parkway, Suite 600

Las Vegas, NV 89169

Tel: (702) 949-8200

MZhong@lewisroca.com

OBrown@lewisroca.com

Attorneys for Plaintiff The Spearmint Rhino

Companies Worldwide, Inc. and K-Kel, Inc.

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

Dated: _____

Case No. 2:23-cv-02040-ART-BNW

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 9, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Trey A. Rothell
TREY A. ROTHELL